

70-72, 74, 78-80, 82, 86-88, and 90 and been amended and new claims 94-105 have been added. Reconsideration and allowance of the present invention is respectfully requested.

In paragraph 1 of the Official Action, the drawings (Figs. 2A-2D) were objected to as lacking a legend indicating prior art. Accompanying this response is a *Request for Approval of Drawing Changes* which includes proposed changes to Figs. 2A-2D in response to the objection. Accordingly, reconsideration and withdrawal of the objection is respectfully requested.

In paragraph 3 of the Official Action, claims 27, 35, 43, 72, 80 and 88 are rejected under 35 U.S.C. §112, second paragraph as being indefinite. By the foregoing amendment to the claims, Applicants respectfully request reconsideration and withdrawal of the rejection.

In paragraph 5 of the Official Action, claims 1-26, 28-34, 36-42, 44-71, 73-79, 81-87 and 89-93 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,485,019 to Yamazaki et al. in view of U.S. Patent No. 4,305,200 to Fu et al. Applicants respectfully traverse the grounds of rejection for the reasons provided below.

The Official Action alleges that the Yamazaki patent discloses a method of manufacturing a semiconductor device comprising the claimed steps except for a pressure higher than 1 atm in the oxidizing step. Fu is relied upon in the Official Action to show the feature that completely oxidizing a polysilicon film in an oxidizing atmosphere at a higher pressure and at a temperature of 900°C or less. Further, the Official Action states that it would have been obvious to one of ordinary skill in the art to utilize the oxidation method of Fu to oxidize the polysilicon film to silicon oxide film.

Applicant notes that the burden of establishing a prima facie case of obviousness under §103 lies with the Patent Office. In re Fine, 5 USPQ2d 1596 (Fed. Cir. 1988). To establish a *prima facie* case of obviousness, (1) there must be some suggestion or motivation (either in the references themselves or in the knowledge generally available to one of ordinary skill in the art) to combine the reference teachings; (2) there must be a reasonable expectation of success; and (3) the prior art references when combined must teach or suggest all the claim limitations. See *MPEP* § 2142-43.

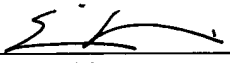
Applicants respectfully submit that the device of Fu is not a thin film transistor but a silicon gate FET using a silicon wafer and that Fu's active layer is formed in the silicon wafer. Additionally, although Fu's oxide process is performed to the polysilicon film 21, the polysilicon film 21 is not employed as an active layer of the device. See, for example, Figs. 2 and 3. Therefore, Applicants submit that there would have been no motivation for one of ordinary skill in the art to combine Fu's oxidizing method with Yamazaki's method for fabricating thin film transistor since Fu's oxide process is not performed to the polysilicon film to be an active layer of the device.

Additionally, it should be noted that Fu discloses that the oxidizing is performed at a temperature of 900°C or less. However, Fu's limitation of the oxidizing temperature is suitable only for the silicon wafer substrate and it is not applicable to present invention since a substrate in the present invention has a strain point of 750°C or less. Accordingly, Applicants respectfully submit that, even if one combined Fu's oxide process with Yamazaki's method for fabricating thin film transistor, the presently claimed invention would not have resulted.

For all of the above reasons, claims 1-105 are believed to be in condition for allowance and favorable reconsideration of the outstanding rejections and examination of the new claims is respectfully requested. If the Examiner feels that any further discussions about this case would be beneficial, she is invited to contact the undersigned.

Respectfully submitted,

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